

RLC:SLT
F.# 2007R00229

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - -X
UNITED STATES OF AMERICA

NOTICE OF MOTION

- against -
NIKOLAI DOZORTSEV,

Criminal Action
Nos. 08-044 (S-1) (CPS)
07-736 (S-3) (CPS)

Defendants,

- and -

IRENA DOZORTSEV,
EUGENE DOZORTSEV,
LARISA DOZORTSEV,
IGOR KATZMAN, and
ARTHUR DOZORTSEV,

Sureties.

- - - - -X

PLEASE TAKE NOTICE that upon the annexed application of BENTON J. CAMPBELL, United States Attorney for the Eastern District of New York, by Assistant United States Attorneys Steven L. Tiscione and Evan Weitz, before the Honorable Charles P. Sifton, United States District Judge for the Eastern District of New York, at 12:00 p.m. on April 13, 2009, or as soon thereafter as counsel may be heard, at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York 11201, the United States will move for: (1) an order, pursuant to Rule 46(f)(1) of the Federal Rules of Criminal Procedure, forfeiting the bail posted herein; (2) an order, pursuant to Rule 46(f)(3) of the Federal Rules of Criminal Procedure, entering judgment on the bail bond

of NIKOLAI DOZORTSEV, against NIKOLAI DOZORTSEV as defendant, and IRENA DOZORTSEV, EUGENE DOZORTSEV, LARISA DOZORTSEV, IGOR KATZMAN, and ARTHUR DOZORTSEV (collectively the "SURETIES"), as sureties in the amount of One Million, Eight Hundred Thousand Dollars (\$1,800,000.00); (3) an order forfeiting to the United States all rights, title and interest in the premises and real property located at 2805 Ocean Parkway, Apt. 10B, Brooklyn, New York, owned by SURETY IRENA DOZORTSEV, posted as security for NIKOLAI DOZORTSEV's bail bond; (4) an order forfeiting to the United States all rights, title and interest in the premises and real property located at 150 West End Avenue, Brooklyn, New York, owned by SURETIES LARISA DOZORTSEV and EUGENE DOZORTSEV, posted as security for NIKOLAI DOZORTSEV's bail bond; (5) an order forfeiting to the United States all rights, title and interest in the premises and real property located at 41 Willow Road, Woodmere, New York, owned by SURETY IGOR KATZMAN, posted as security for NIKOLAI DOZORTSEV's bail bond; (6) an order forfeiting to the United States all rights, title and interest in the premises and real property located at 411-415 John Street, Elizabeth, New Jersey, owned by SURETY ARTHUR DOZORTSEV, posted as security for NIKOLAI DOZORTSEV's bail bond; (7) an order directing the United States Marshal to place the United States of America in immediate peaceful and exclusive possession of the aforementioned parcels of real property; and (8) an order appointing a Receiver, pursuant to Rule 69 of the Federal Rules

of Civil Procedure and Section 5228 of the New York Civil Practice Laws and Rule, to take possession of and sell the aforementioned parcels of real property and apply the sale proceeds in partial satisfaction of the judgment entered against NIKOLAI DOZORTSEV and the SURETIES.

Dated: Brooklyn, New York
April 2, 2009

BENTON J. CAMPBELL
United States Attorney
Eastern District of New York
271 Cadman Plaza East
Brooklyn, New York 11201

By: _____
STEVEN L. TISCIONE
EVAN WEITZ
Assistant U.S. Attorneys
(718) 254-6317
(718) 254-6148

TO: NIKOLAI DOZORTSEV
IRENA DOZORTSEV
EUGENE DOZORTSEV
LARISA DOZORTSEV
IGOR KATZMAN
ARTHUR DOZORTSEV
CLERK OF COURT